

UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF NEW YORK

RD 3/9/2000

WEI ZHANG, derivatively on behalf of PARETEUM CORPORATION,

DROOKLYN OFFICE

Case No. 1:19-cv-06811-WFK-CLP

Plaintiff.

V

ROBERT TURNER, EDWARD O'DONNELL, DENIS MCCARTHY, VICTOR BOZZO, LUIS JIMENEZ-TUNON, ROBERT LIPPERT, LAURA HOLMES, and YVES VAN SANTE NOTICE OF VOLUNTARY
DISMISSAL WITHOUT
PREJUDICE PURSUANT TO
F.R.C.P. 41(A)(1)(A)(I)

Defendants,

-and-

PARETEUM CORPORATION

Nominal Defendant.

Pursuant to F.R.C.P. 41(a)(1) and 23.1(c) of the Federal Rules of Civil Procedure, Plaintiff Wei Zhang hereby gives notice that the above-captioned action is voluntarily dismissed without prejudice against Defendants.

Voluntary dismissal is appropriate under Fed. R. Civ. P. 41(a)(1) given that Defendants have not answered the Complaint or filed a motion for summary judgment.

Notice of this voluntary dismissal is not required under Fed. R. Civ. P. 23.1(c) because neither Plaintiff nor Plaintiff's counsel have received or will receive any compensation for this dismissal.

Dated: March 3, 2020

Respectfully submitted,

THE BROWN LAW FIRM, P.C.

Timothy Brown 240 Townsend Square Oyster Bay, NY 11771 Telephone: (516) 922-5427 Facsimile: (516) 344-6204 tbrown@thebrownlawfirm.net

Attorneys for Plaintiff Wei Zhang

The application is SO ØRDERED

s/WFK William F. Kuntz, JI, 45.D.J.

Dated: A J H Brooklyn, New York